

UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

P J Cotter, Plaintiff,
vs.
GMAC MORTGAGE, LLC,
Defendants)
)
)
) Case No. 2:12-cv-15382-NGE-LJM
)
)
) Judge Nancy G. Edmunds
) Magistrate Judge Laurie J. Michelson
)
)

PJ Cotter
6243 Church Road
Fair Haven, MI 48023
810-689-9231
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Thomas M. Schehr (P54391)
Nasseem S. Ramen (P73513)
Attorneys for Defendant

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Detroit, MI 48243
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**PLAINTIFF'S VERIFIED MOTION TO STAY ANY AND ALL FURTHER ORDERS,
DECREES OR JUDGMENTS.**

COMES NOW, Plaintiff PJ Cotter (hereinafter Plaintiff), unrepresented by counsel, and
enters the following, VERIFIED MOTION TO STAY ANY AND ALL FURTHER ORDERS,
DECREES OR JUDGMENTS.

Plaintiff continues to discover fraudulent and/or criminal acts committed by Defendants by and through their corporations as a means to unlawfully divest the True Owner, Plaintiff, of the real property in question.

For the foregoing reasons, this Court should grant Plaintiff a MOTION TO STAY ANY AND ALL FURTHER ORDERS, DECREES OR JUDGMENTS on all non-judicial foreclosure proceedings commenced by any Defendant against Plaintiff and/or Plaintiff's property; and this

1 Court should demand Defendants to provide this Court *prima facie* evidence. Defendants have
2 reported consistent claims to all appropriate government entities; and this Court should demand
3 Defendants correct all publicly recorded documents forthwith.

4 WHEREFORE, for good cause, the Defendants have not shown the facts, the law, and any
5 admissible evidence in the record to commence a Foreclosure by Advertisement.

6 Plaintiff moves the Court to cease making any further orders, judgments or decrees on the
7 case due to the Plaintiffs discovery of every document entered into the court, referencing the
8 Plaintiff, every document entered and transmitted to the Plaintiff by the Defendants attorneys and
9 all corporate entities involved are forged and\or counterfeit; thereby creating a deceitful and sham
10 defense proceedings upon this court.

11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing statements are true and correct to the best of my knowledge.

14 Further affiant sayth not.

15 Executed this 19th day of August 2013, at Saint Clair County, Michigan.

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PJ Cotter
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(810) 459-6972

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CERTIFICATE OF SERVICE

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12 I P J Cotter certify that on this 19th day of August 2013 a copy of the foregoing documents
13 filed in the U.S. District Court In The Eastern District of Michigan Southern Division, were served
14 upon the following parties via U.S.P.S. first class mail

15

16 Thomas M. Schehr (P54391)
17 Nasseem S. Ramen (P73513)
18 *Attorneys for Defendant*
19 Dykema Gossett PLLC
20 400 Renaissance Center, 37th floor
21 Detroit, MI 48243
22 313-568-5326

23

24 I declare under penalty of perjury under the laws of the United States of America that the
25 foregoing is true and correct.

26

27 Executed this 19th day of August 2013, at Saint Clair County, Michigan.

28


PJ Cotter